

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

APR 30 20 03 10 44

**IN RE: UNIVERSAL SERVICE
GENERIC CONTESTED CASE**

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DOCKET NO. 97-00888

SECRETARY

**MOTION BY INTERESTED PARTY TO INTERVENE IN CONTESTED CASE
PROCEEDING**

Comes the Tennessee Department of Environment and Conservation, an entity of state government and interested party, and pursuant to T.C.A. Section 65-2-107, moves to intervene in the above referenced contested case proceeding before the Tennessee Regulatory Authority. In support thereof, movant would show as follows:

1. The Tennessee State Parks System is administered by the Division of State Parks of the Tennessee Department of Environment and Conservation. The Division of State Parks administers 51 state park locations within the State of Tennessee. These State Parks are operated for the education and enjoyment of the citizens of Tennessee.

2. Some of these State Parks are remote in location, or have areas which are remote. Persons making use of these areas have an interest in being able to summon assistance, if needed. Parks within the State Park System are served by public interest pay telephones which allow a caller to place an emergency telephone call without payment. This is considered to be an important service made available for the welfare of the public.

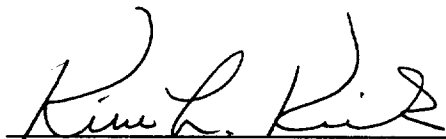
3. The Tennessee Department of Environment and Conservation has received notice that the above referenced contested case proceeding has been convened, and that this proceeding may have an impact upon the availability of public interest pay telephone service. The Tennessee Department of Environment and Conservation, therefore, requests that it be permitted to intervene for the purpose of supplying information pertinent to the proceeding, and in order that the interests of the Tennessee Department of Environment and Conservation and its affected customers may be considered.

WHEREFORE, the Tennessee Department of Environment and Conservation requests that it be permitted to intervene in this proceeding pursuant to T.C.A. Section 65-2-107.

Respectfully Submitted this 28th day of October, 1997:

TENNESSEE DEPARTMENT OF ENVIRONMENT
AND CONSERVATION

By:

A handwritten signature in cursive script, appearing to read "Kim L. Kirk", written over a horizontal line.

Kim Lynnora Kirk, BPR #10013
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